

IN THE UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MISSOURI
EASTERN DIVISION

UNITED STATES OF AMERICA,)	
)	
Plaintiff,)	
)	
vs.)	No. 4:23-CR-00562 RLW JSD
)	
JUSTIN LEE,)	
)	
Defendant.)	

SUPPLEMENTAL MOTION FOR PRE-TRIAL DETENTION AND HEARING

Comes now the United States of America, by and through its attorneys, Sayler A. Fleming, United States Attorney for the Eastern District of Missouri, and Ashley M. Walker, Assistant United States Attorney for said District, and moves the Court to order Defendant Justin Lee detained pending trial, and further requests that a detention hearing be held three (3) days from the date of Defendant's initial appearance before the United States Magistrate pursuant to Title 18, United States Code, Section 3141, et seq.

As and for its grounds, the United States of America states as follows:

1. Title 18, United States Code, Section 3142(g) provides factors that the Court must consider in determining whether to order Defendant detained pending trial. These factors include: (a) the nature and circumstances of the offense charged; (b) the weight of the evidence against Defendant; (c) Defendant's criminal history and characteristics; and (d) the danger that would be posed by Defendant's release to any particular individual or the community as a whole.

2. Defendant is currently charged by Indictment with one count of Conspiracy to Commit Murder for Hire, in violation of 18 U.S.C. § 1958, and one count of Murder for Hire, in violation of 18 U.S.C. §§ 1958 & 2.

3. According to an investigation by the St. Louis Metropolitan Police Department (SLMPD) and FBI, in the early morning hours of July 7, 2023, SLMPD officers were alerted to a “Person Down” in the alley of the 4400 block of Kennerly Avenue. There, responding officers discovered victim AW deceased after suffering multiple apparent gunshot wounds.

4. After learning victim AW’s cellphone number, investigators obtained call records and identified the cellphone numbers that communicated with victim AW’s cellphone in the hours leading up to her murder.

5. Investigators also obtained state-level search warrants for tower/area cellular data from three points critical to the investigation: (1) victim AW’s residence; (2) a point along the path victim AW’s device travelled from her residence to the location where her body was recovered, and (3) the place where her body was recovered. From that data, investigators were able to identify the Defendant, Justin Lee, and co-Defendant Eric Washington, based on cellular devices that were with victim AW’s cellular device at or near the same time at all three points. Investigators further determined that Defendant’s device communicated with the cellular devices associated with co-Defendant Eric Washington throughout the day on July 6th.

6. The evidence collected by cellular data demonstrates that on July 6, 2023, the Defendant’s device called the victim’s number multiple times, and the victim’s **last** outgoing call was to the Defendant before the devices travelled together to the area where the victim was found in the early morning on July 7, 2023. Notably, based on the review of the records, it does not appear that the Defendant had any cellular communications with victim AW prior to July 6, 2023.

7. The Defendant is charged with violent crimes, one of which carries a maximum penalty including death. Accordingly, the United States moves the Court to order Defendant detained pending trial, and further requests that a detention hearing be held three (3) days from the

date of Defendant's initial appearance before the United States Magistrate pursuant to Title 18, United States Code, Section 3141, et seq. It is the government's position that the Defendant is a flight risk and a danger to the community.

8. Based on the statutory factors in 18 U.S.C. 3142(g), detention is appropriate in this case. Pursuant to Section 3142(g)(1), the nature and circumstances of this case are that the Defendant has been charged with crimes of violence. Pursuant to Section 3142(g)(2), the weight of the evidence against the Defendant, as summarized above, is strong.

WHEREFORE, the Government requests that this Court order Defendant detained prior to trial, and further order a detention hearing three (3) days from the date of Defendant's initial appearance.

Respectfully submitted,

SAYLER A. FLEMING
United States Attorney

/s/ Ashley M. Walker
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CERTIFICATE OF SERVICE

The undersigned hereby certifies that a true and accurate copy of this document was filed with the Court's electronic file management system for service upon all parties and counsel of record on October 19, 2023

s/Ashley M. Walker
ASHLEY M. WALKER, #67175MO
Assistant United States Attorney